

2. As detailed in Guarantors' Brief in Support of this Motion filed contemporaneously with this Court, the Counterclaims fail to state a plausible claim for relief against Guarantors on its cause of action for alleged past-due rent arising before March 6, 2017, and the Court should dismiss the same.

Accordingly, Guarantors respectfully request that the Court dismiss Landlord's claim for past-due rent accruing before March 6, 2017, and for all other relief to which they are justly entitled.

Respectfully submitted,

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CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing document has been furnished to all counsel of record in accordance with the Federal Rules of Civil Procedure and the Local Civil Rules of the U.S. District Court for the Northern District of Texas this 12th day of April, 2018.

/s/ Joshua L. Hedrick

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